

THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI

IN RE:)
)
DONALD KEITH JOHNSON) Case No: 11-44920-drd13
NANCY ELIZABETH CHAMBERS)
)
Debtors.)

MOTION TO INCUR ADDITIONAL INDEBTEDNESS
AND NOTICE TO CREDITORS

COME NOW the Debtors, DONALD KEITH JOHNSON and NANCY ELIZABETH CHAMBERS, by and through their attorney of record, Lorinda D. Walters, and for their Motion to Incur Additional Indebtedness, state as follows:

1. The Debtors filed their Chapter 13 petition and Chapter 13 Plan and Plan Summary on October 21, 2011.
2. The Debtors' Chapter 13 Plan was confirmed on December 22, 2011.
3. In September 2012, Debtor Nancy Chambers relocated to Austin, Texas and commenced new employment with StatOil. Said Debtor lived in temporary housing, which is now no longer available to her. Debtor Nancy Chambers is, thus, in need of obtaining housing for herself, and has located rental property for the sum of \$787.00 per month. Because of her new job, Debtor Nancy Chambers will be able to lease this rental property and the Debtors will still be able to make their monthly plan payments.
4. The rental property is located at 10301 FM 2222, Apt. 1716, Austin, Texas 78730, and the lease term commences January 29, 2013 at \$787.00 per month for a lease period of twelve (12) months.

WHEREFORE, the Debtors, by and through their attorney of record, Lorinda D. Walters, move the Court for an order to allow Debtor Nancy Chambers to incur additional indebtedness in the form of a one-year lease of rental property at \$787.00 per month, commencing January 29, 2013.

WALTERS LEGAL SERVICES

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NOTICE TO CREDITORS AND OTHER PARTIES IN INTEREST

NOTICE IS GIVEN THAT:

Any Response to this Motion must be filed within twenty-one (21) days of the date of this notice, pursuant to Local Rule 9013-1C, with the Clerk of the United State Bankruptcy Court. Parties represented by an attorney shall file electronically at <http://ecf.mowb.uscourts.gov>. Pro se parties shall mail filings to: United States Bankruptcy Court, Western District of Missouri, 400 East 9th Street, Room 1510, Kansas City, MO 64106. Pursuant to 9013-1D, responses shall address the merits of the motion, and, if applicable, set out actions to remedy the particular problem. The Court will serve such response electronically on the Trustee, Debtor's attorney and all other parties to the case who have registered for electronic filing. Respondent shall serve all parties who are not served electronically. If a Response is timely filed, a hearing will be held on a date and time determined by the Court. Notice of such hearing will be provided to all parties in interest. If no Response is filed within twenty-one (21) days, the Court will enter an Order granting the Motion.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Motion to Incur Additional Indebtedness and Notice to Creditors was mailed this 21st day of January, 2013, by first class mail, postage prepaid, to all creditors on the mailing matrix, and to all interested parties requesting notice.

/s/ Lorinda D. Walters